

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc., *et al.*¹

The Debtors.

Chapter 11

Bky Case No. 23-10763 (AMC)
(Jointly Administered)

WITNESS AND EXHIBIT LIST FOR HEARING ON NOVEMBER 13, 2024

Visual Semiconductor, Inc. ("VSI") hereby files its Witness and Exhibit List for the hearing to be held on November 13, 2024 at 11:00 a.m. (Eastern Time) (the "Hearing") before the Honorable Judge Chan, in the United States Bankruptcy Court for the Eastern District of Pennsylvania, located at 900 Market Street, Suite 203, Philadelphia, Pennsylvania, 19807.

WITNESSES

VSI designates the following persons as witnesses who may be called at the Hearing:

1. Mathu Rajan, Founder and CEO of the Debtors;
2. Rafael Zahralddin;
3. Nicole Maneen;
4. William A. Homony, the Chapter 11 Trustee;
5. Christopher Michaels;
6. Scott Victor; and
7. Any other witness called by another party.

EXHIBITS

¹ The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

VSI designates the following exhibits that may be admitted and/or of which VSI may ask the Court to take judicial notice.

VSI reserves all rights to introduce and/or request judicial notice of any or all of the following exhibits as evidence at the hearing, each as may be amended, and expressly included any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto:

No.	Description
1.	Visual Semiconductor Inc Objection to the Motion of William A. Homony in His Capacity as Chapter 11 Trustee for (I) An Order (A) Approving Bidding Procedures and Form of Asset Purchase Agreement for the Sale of Substantially All of the Debtor's Assets Including Approval of the Provisions for Designation of A Stalking Horse (B) Establishing the Notice Procedures and Approving the Form and Manner of Notice Thereof and Scheduling and Auction, (C) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (D) Scheduling A Sale Hearing, (E) Granting Related Relief, and (II) An Order Approving (A) the Sale of Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto and (C) Granting Related Relief (the "Objection to the Sale Motion") [ECF #788]
2.	Declaration of John H. Thompson In Support of VSI's Objection [ECF #788-1]
3.	Email communications [filed as Exhibits 1-10 to the Thompson Declaration, ECF #788-1]
4.	Delaware Supreme Court Decision dated June 15, 2022 [filed as Exhibit B, ECF #788-2]
5.	Delaware Chancery Court ruling ordering a telephonic hearing for July 20, 2022 [filed as Exhibit C, ECF #788-3]
6.	Copy of the 7/20/22 Delaware Chancery Court hearing transcript [filed as Exhibit D, ECF #788-4]
7.	Delaware Chancery Court issued Temporary Restraining order enjoining SeeCubic from selling Stream's assets [filed as Exhibit E, ECF #788-5]
8.	Memorandum Opinion, Case No. 2020-0766-JTL (Del. Ch. Sept. 28, 2022). [filed as Exhibit F, ECF #788-6]

9.	Delaware Chancery Court issued Mandatory Injunction order requiring the Hawk Parties to return certain assets to Stream [filed as Exhibit G, ECF #788-7]
10.	Delaware Chancery Court issued Order finding Stastney and the Hawk Parties in contempt [filed as Exhibit H, ECF #788-8]
11.	United Kingdom "Cold Shoulder" Order [filed as Exhibit I, ECF #788-9]
12.	Email communications from Baskin to Obermayer re TRO [filed as Exhibit J, ECF #788-10]
13.	Email communications from C. Michaels to Obermayer re TRO [filed as Exhibit K, ECF #788-11]
14.	Email communication from W. Homony to Bud re TRO [filed as Exhibit L, ECF #788-12]
15.	SSG Advisors, LLC flyer Acquisition Opportunity: Glasses-Free 3D Technology [filed as Exhibit M, ECF #788-13]
16.	10/6/23 Hearing Transcript [filed as Exhibit N, ECF #788-14]
17.	Technology License Agreement between Koninklijke Philips Electronics N.V. and Ultra-D Cooperatief U.A. [filed as Exhibit O, ECF #788-15]
18.	Rembrandt Settlement Agreement [filed as Exhibit P, ECF 788-16]
19.	Praeipce to Substitute Exhibit "B" to Motion of William A. Homony In his Capacity as Chapter 11 Trustee for (I) An Order (A) Approving the Bidding Procedures and Form of Asset Purchase Agreement for the Sale of Substantially all of the Debtors' Assets, (B) Establishing the Notice Procedures and Approving the Form and Manner of Notice Thereof and Scheduling a Sale by Auction, (c) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (D) Scheduling a Sale Hearing, (E) Granting Expedited Consideration Pursuant to Local Rule of Bankruptcy Procedure 5070-1(g) and (F) Granting Related Relief and (II) an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of all Liens, Claims, Encumbrances, and other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Related relief [Docket No. 795] and all exhibits thereto.
20.	All exhibits used by any other party
21.	Any pleadings filed in this case
22.	Any exhibit designated or used by any other party

RESERVATION OF RIGHTS

VSI reserves the right to introduce one or more, or none, of the witnesses above, and reserves the right to call any witness as a rebuttal, whether named herein or not, and to introduce any other documents into evidence as rebuttal / impeachment exhibits, whether or not listed.

VSI further reserves the right to supplement this list prior to the hearing.

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Dated: November 12, 2024

Respectfully submitted,

AKERMAN LLP

/s/ R. Adam Swick

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was filed electronically with the United States Bankruptcy Court for the Eastern District of Pennsylvania on November 12, 2024 with notice sent electronically to all parties receiving electronic notices in this case pursuant to local rules of this Court, and that no further notice or service is necessary.

/s/ R. Adam Swick

R. Adam Swick